

Remarks

Reconsideration of this Application is respectfully requested.

Claims 1-11 are pending in the application, with claims 1, 9, 12, and 13 being the independent claims. Claims 1, 9, and 13 are sought to be amended. Claims 2 and 5 were previously cancelled. These changes are believed to introduce no new matter, and their entry is respectfully requested.

Based on the above amendment and the following remarks, Applicants respectfully request that the Examiner reconsider all outstanding rejections and that they be withdrawn.

Rejections under 35 U.S.C. § 103

Claims 1, 3-4, and 6-13 were rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over U.S. Patent No. 5,615,352 to Jacobson *et al.* (hereinafter Jacobson), and in view of U.S. Patent No. 5,524,204 to Verdoorn, Jr. (hereinafter Verdoorn). Applicants respectfully traverse this rejection.

In rejecting the claims, the Examiner argues that Figures 7-12 of Jacobson illustrate the process of distributing old data among drives 0, 1, 2, 3, and 4 (the new disk drive) "while mapping new data to the spare space [unused storage space (i.e., spare space) . . . to facilitate a user's new storage request (i.e. new data to be stored in the disk drives (column 12, lines 35-43)]" Applicants respectfully note that Col. 12, lines 35-43 of Jacobson disclose a RAID system where a user's storage request is "mapped into an expanded RAID area that includes the new disk space." Col. 12, lines 40-41.

Jacobson fails to teach or suggest "distributing the old data among the set of data disk drives and at least one new disk drive while mapping new data to the spare space of the first array," as recited in claim 1. Nowhere does Jacobson teach or suggest mapping new data into the spare space of the first array, which does not include the disk space of a new drive. Verdoorn is not used to teach or suggest this feature; nor does it cure the deficiency of Jacobson.

The features of mapping new data into the spare space of the first array is common to each of independent claims 1, 9, 12, and 13. Applicants submit that independent claims 1, 9, 12, and 13 are patentable over Jacobson and Verdoorn, alone or in combination, for at least the foregoing reasons. Claims 3-4 and 6-8 depend from claim 1. Claims 10 and 11 depend from claim 9. These dependent claims are thus patentable over Jacobson and Verdoorn, alone or in combination, for at least the reasons provided above, and further view of their own features. Applicants therefore request that the Examiner reconsider and withdraw the rejection of claims 1, 3-4 and 6-13.

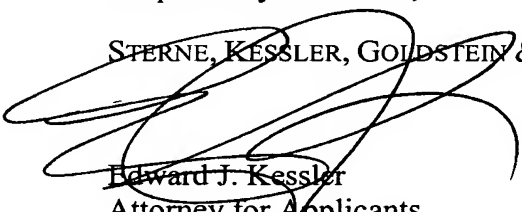
Conclusion

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

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